## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS 147815EASTERN DIVISION

CHRISTIAN DIOR COUTURE, S.A.,

Plaintiff,

v.

THE PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE "A,"

Defendants.

Case No. 22-cv-02391

Hon. Steven C. Seeger

Magistrate Judge Gabriel A. Fuentes

## PLAINTIFF'S MOTION FOR ENTRY OF A TURNOVER ORDER DIRECTED TO PAYPAL HOLDINGS INC.

Pursuant to Fed. R. Civ. P. 69 and 735 ILCS 5/2-1402, Christian Dior Couture, S.A. ("Dior" or "Plaintiff"), by its counsel, moves this Honorable Court for an order for turnover or funds belonging to Defendants currently held by PayPal Holdings Inc. ("PayPal"). In support of this motion, Plaintiff states the following.

On January 10, 2023, this Court entered judgment in favor of Plaintiff and against Defendants in the amount of two thousand dollars (\$2,000) for willful use of counterfeit CHRISTIAN DIOR Trademarks, per defendant, and two thousand dollars (\$2,000) for willful copyright infringement of the Dior Copyrighted Designs, per defendant. [54]. On January 12, 2023, the Clerk of the Court issued a Citation to Discover Assets ("Citation") directed to PayPal and regarding the below Defendants (the "Judgment Debtors").

No.	URL	Online Marketplace
	instagram.com/luxury_we_love_8	
181	6/	luxury_we_love_86
182	instagram.com/luxurybag1996/	luxurybag1996
183	instagram.com/luxurybags0909/	luxurybags0909
184	instagram.com/luxurybuyer_china/	luxurybuyer_china
185	instagram.com/luxurysuppliers89/	luxurysuppliers89

186	instagram.com/nan55699/	nan55699
187	instagram.com/nparisat/	nparisat
188	instagram.com/nuxury.cna/	nuxury.cna
189	instagram.com/quangjiafukui/	quangjiafukui
190	instagram.com/r30ac44_0ac4455/	r30ac44_0ac4455
191	instagram.com/sara luxury m1/	sara luxury m1
	instagram.com/tina_collection_wo	
192	men2021/	tina collection women2021
193	instagram.com/valuable86676/	valuable86676
194	instagram.com/vhg8taqo/	vhg8taqo
195	instagram.com/vipsupply_2/	vipsupply_2
196	instagram.com/z13249137629w/	z13249137629w
197	bitcoinsbank	bitcoinsbank
198	Stacy007	Stacy007
199	antmall.ru	antmall.ru
200	antmall.ru	antmall.ru
201	antmall.ru	antmall.ru
202	antmall.ru	antmall.ru
203	antmall.ru	antmall.ru
204	bagreps.com	bagreps.com
205	bagreps.com	bagreps.com
206	eevshop.com	eevshop.com
208	plum0926.x.yupoo.com/	plum0926
209	sybrandjewelry.com	sybrandjewelry.com
211	luxurybrandtop.com	luxurybrandtop.com
212	fauxpursesale.com	fauxpursesale.com
213	dkiqsale.com	dkiqsale.com
214	luxbag.top	luxbag.top
215	loveluxurybrand.com	loveluxurybrand.com
216	richluxuries.com	richluxuries.com
217	ilikeluxuries.com	ilikeluxuries.com
218	goodluxurystore.com	goodluxurystore.com

Plaintiff served PayPal with the Final Judgment Order and Citation on January 12, 2023. On January 31, 2023, PayPal served Plaintiff with its Answer identifying that it withheld funds belonging to the Judgment Debtors pursuant to the Citation.

Plaintiff hereby request that this Court enter an order directing PayPal to turnover the funds belonging to the Judgment Debtors being held in accordance with the Citation pursuant to Fed. R. Civ. P. 69 and 735 ILCS 5/2-1402.

Dated this 17<sup>th</sup> day of February 2023.

Respectfully submitted,

/s/ Justin R. Gaudio

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Attorneys for Plaintiff Christian Dior Couture, S.A.

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 17th day of February 2023, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, I will electronically publish the documents on a website and I will send an e-mail to the e-mail addresses identified in Exhibit A hereto that includes a link to said website. I will also send a copy of the foregoing to counsel for PayPal.

/s/ Justin R. Gaudio

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